

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

**FOLLOW-UP INSTITUTIONAL INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-10-11)
(September 15, 2011)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following institutional interrogatories to United States Postal Service as follow-up to Postal Service witness testimony at the September 8, 2011, hearing on the Postal Service direct case.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Boldt (APWU/USPS-T1-1-5), filed on August 15, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T-10 During the September 8, 2011 hearing on the Postal Service's direct case, Postal Service Witness James Boldt testified about the removal of Alaskan postal facilities from the RAOI list of candidates to be studied for discontinuance.

- a) Please identify each Alaskan facility that was removed from the RAOI list and the rationale for each decision to remove.
- b) Please provide any documentation related to the removal of these facilities from consideration.
- c) Were any of the Alaskan facilities that remain on the RAOI list also studied for possible removal? If so, why did these facilities remain on the list?
- d) Please provide any documentation supporting the decision to keep each remaining Alaskan facility on the RAOI list.

APWU/USPS-T-11 During the September 8, 2011 hearing on the Postal Service's direct case, Postal Service Witness James Boldt also testified that approximately 80 facilities had been removed from the RAOI list of candidates to be studied for discontinuance.

- a) Please identify each facility removed from the list and the rationale for each decision.
- b) Please provide any documentation related to the removal of these facilities from consideration.